



HONG KONG
RETAIL MANAGEMENT
ASSOCIATION

香港零售管理協會

CB(1) 1918/07-08(01)

13 June 2008

The Honourable Choy So-yuk
Chairman
Bills Committee on Product Eco-responsibility Bill
Legislative Council
Legislative Council Building
8 Jackson Road, Central
Hong Kong

(By fax 2869 6794)

Dear Ms. Choy,

Re: Product Eco-responsibility Bill

The Hong Kong Retail Management Association (“HKRMA”) submitted to the Bills Committee on Product Eco-responsibility Bill (“the bill”) on 23 February 2008 its specific comments on the bill that is being scrutinized by the Legislative Council.

The HKRMA proposed that registration should be required for each “registered retailer”, but not for each retail outlet to avoid excessive and onerous administrative burden to the trade, and accordingly proposed under Clauses 17(1), 17(2), 19(6) and 19(7) of the bill, that “qualified retail outlet” and “registered retail outlet” be deleted. We are, however, very disappointed to learn that the Government has not accepted our suggestion and failed to explain why registration and deregistration at the retail outlet level, rather than at the retailer level, is necessary.

It is unnecessary to keep a register of all of the retail outlets that are operated by registered retailers in order to let the public know whether a particular retail outlet is subject to the environmental levy, but we agree that registered retailers should provide the name of its store brands when it applies to be registered pursuant to Clause 19(3).



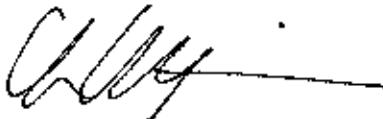
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If necessary, registered retailers should send to the Government a list of its retail outlets on a quarterly basis (at the same time that returns are submitted to the Government).

We are in full support of any initiatives that can help protect the environment, but the Government should devise a scheme that is practical and workable. We hope such a concern will be addressed at the Bills Committee.

Yours faithfully,

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Philippe Giard

Chairman

Government Regulations Sub-Committee

Hong Kong Retail Management Association

c.c. Environmental Protection Department (Fax: 3121 5758)

Business Facilitation Advisory Committee (Fax: 2537 7566)